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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDON MARCUS KAIN,

Defendant.

Case: 4:21-cr-20234  
Judge: Davis, Stephanie Dawkins  
MJ: Ivy, Curtis  
Filed: 04-07-2021 At 11:20 AM  
SEALED MATTER (tt)

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**INDICTMENT**

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**THE GRAND JURY CHARGES:**

**COUNT ONE**

**Unlawfully attempting to damage or destroy by explosive device a building  
used in interstate commerce  
(18 U.S.C. § 844(i))**

On or about August 3, 2020, in the Eastern District of Michigan, Brandon Marcus Kain did willfully and maliciously attempt to damage or destroy, by means of an explosive device, a building used in interstate commerce or in any activity affecting interstate commerce, that is, a rental home located at 13044 Virginia Drive, Montrose, Michigan, in violation of Title 18, United States Code, Section 844(i).

## **FORFEITURE ALLEGATIONS**

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby gives notice to the defendant of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or property traceable thereto; all property that facilitated the commission of the violations alleged, or property traceable thereto; all property involved in, or property traceable to, the violations alleged in this Indictment.

**THIS IS A TRUE BILL.**

Dated: April 7, 2021

s/GRAND JURY FOREPERSON

SAIMA S. MOHSIN  
Acting United States Attorney

ANTHONY P. VANCE  
Assistant United States Attorney  
Chief, Branch Offices

s/TIMOTHY M. TURKELSON  
TIMOTHY M. TURKELSON (P53748)  
Assistant United States Attorney  
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**Companion Case information MUST be completed by AUSA and initialed.**United States District Court  
Eastern District of Michigan**Criminal Case Cover Sheet** | Case Number

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

Case: 4:21-cr-20234  
Judge: Davis, Stephanie Dawkins  
MJ: Ivy, Curtis

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: TT

Case Title: USA v. BRANDON MARCUS KAINCounty where offense occurred : GENESEECheck One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.  
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Original case was terminated; no additional charges or defendants.  
☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

April 7, 2021

Date

s/Timothy Turkelson

Timothy Turkelson  
Assistant United States Attorney  
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600 Church Street  
Flint, Michigan 48502  
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P53748

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.